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May 13, 2024

By ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Perkins v. The New York Times Company*, Case No. 1:22-cv-05202-PKC

Dear Judge Castel:

The undersigned represent Plaintiff Megan Perkins and Defendant The New York Times Company in the above-referenced matter. We write to inform the Court that the parties have reached agreement on all material terms of a class action settlement. Accordingly, the parties request that the Court enter an order staying all upcoming deadlines and that the Court adjourn the status conference currently scheduled for June 26, 2024.

The parties will work to complete and execute promptly a Class Action Settlement Agreement, and Plaintiff intends to file a motion for preliminary approval of the proposed settlement shortly thereafter.

Respectfully submitted,

/s/ J. Hunter Bryson

J. Hunter Bryson, Plaintiff's Counsel

/s/ Stephen V. Carey

Stephen V. Carey, Defendant's Counsel

cc: All counsel of record (Via ECF)

*All upcoming
deadlines are stayed
and the June 26 conference
vacated on condition
that a motion for preliminary
approval is filed by
July 12, 2024.*

SO ORDERED
[Signature]
USDC
5-14-24